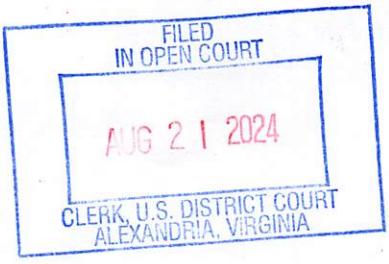


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION



UNITED STATES OF AMERICA

v.

RUSSELL RICHARDSON VANE, IV,
Defendant.

Case No. 1:24-cr-101

Hon. Anthony J. Trenga

STATEMENT OF FACTS

The United States and the defendant, RUSSELL RICHARDSON VANE, IV (hereinafter, "the defendant"), agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. In or around December 2022, the defendant conducted a number of searches on his federal government workplace computer, which was located in the Eastern District of Virginia, for instructions on how to separate ricin toxin from castor beans.

2. At some time in or around December 2022 or January 2023, the defendant obtained castor beans and, in a residence at or near Vienna, Virginia, in the Eastern District of Virginia, did in fact successfully separate ricin toxin from the castor beans he had obtained. The defendant disposed of the byproducts of the production and stored a sample of the ricin in a test tube in order to test it further for the presence of ricin toxin. However, the defendant was unable to readily obtain equipment that would allow him to conduct such a test. He therefore left the test tube in a storage box in his home.

3. Thereafter, on or about April 10, 2024, at or near Vienna, Virginia, in the Eastern District of Virginia, the defendant knowingly possessed a toxin as defined in 18 U.S.C. § 178(2),

specifically, ricin. Laboratory equipment that the defendant used to separate the ricin was recovered during a search of the defendant's residence on or about April 10, 2024.

4. In order to lawfully possess ricin, the defendant would have been required to obtain a registration as required by regulations under section 351A(c) of the Public Health Services Act. The defendant had not at any time obtained such a registration.

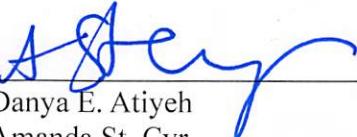
5. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

6. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

Jessica D. Aber
United States Attorney

Date: August 21, 2024

By: 
Danya E. Atiyeh
Amanda St. Cyr
Assistant United States Attorneys

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, RUSSELL RICHARDSON VANE, IV, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.


RUSSELL RICHARDSON VANE, IV

I am Robert Moscati, Esq., defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.


Robert Moscati, Esq.
Attorney for RUSSELL RICHARDSON VANE, IV